

## **CC Docket No. 94-102 – E911 Interim Report**

Filed by: Commnet of Florida, L.L.C.  
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Date: July 31, 2003

To: Marlene H. Dortch, Secretary  
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By Electronic Submission:

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## **TIER III CARRIER INTERIM REPORT**

### **CC Docket No. 94-102**

Commnet of Florida, L.L.C. ("Commnet") hereby submits its E911 Interim Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, FCC 02-210, released July 26, 2002 (*Non-Nationwide Carrier E911 Order*), and *Public Notice*, DA 03-2113, released June 30, 2003.

#### **Carrier Identifying Information:**

**Carrier Name:** Commnet of Florida, L.L.C. – FRN 0005-2580-90

**E911 Compliance Officer:** David Walker  
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#### **E911 Implementation Information:**

In February 2003, FCC rules changed, and carriers were given the flexibility to pursue alternative business models. Commnet has moved to an alternative business model, specifically, becoming a "carriers' carrier". Thus, Commnet has no retail business, providing only wholesale service to other carriers. COMMNET THUS HAS NO SUBSCRIBERS AND WILL NOT HAVE ANY SUBSCRIBERS. Based on this premise, Commnet hereby reports as follows:

- ☐ Commnet has received one Phase I request and no Phase II requests from PSAPs. Commnet has obtained and installed all of the network equipment and software necessary to meet the PSAP's Phase I request. However, Commnet is dependent on a landline between the switch and the requesting PSAP for Phase I deployment, and is currently still working with the local exchange carrier ("LEC") to have a landline installed. Commnet's system operates in rural areas, and it can take a LEC as long as 12 or even 18 months to install a new landline in a rural area. Commnet is still waiting for the installation of the landline connection to the requesting PSAP, and thus the PSAP's request has been outstanding longer than six-months. Commnet anticipates installation of the landline to be completed in the very near future.
- ☐ Commnet is employing a handset-based solution for incoming roamers. Commnet is using TDMA technology supplied by Airbiquity. Airbiquity is based in the State of Washington.
- ☐ Commnet intends to serve incoming roamers using a handset-based solution. As such, Commnet has installed all of the necessary network equipment for Phase I deployment. Commnet anticipates a significant problem with its Phase II deployment. Specifically, Commnet elected to use a handset-based solution for its E911 deployment, because it was the only attainable solution, either technically or financially. Recently, the FCC ruled that Airbiquity, the only vendor of TDMA handset-based solutions, was not offering a Phase II-

compliant handset. Now, neither Airbiquity nor any other vendor will be supporting a handset-based TDMA solution.

Moreover, Commnet is unable to switch to a network-based solution, because it is technically impossible. For a network-based solution to function, a handset must be located within the reliable service area of at least three cell sites simultaneously, in order to triangulate the position of the handset. Commnet operates only in less densely populated areas where the cell sites are spread far apart and there is little overlap between two cells and even less overlap among three cells. Only a minor portion of Commnet's service area is potentially susceptible to triangulation techniques; the bulk of the service area is not susceptible to triangulation and Commnet could never meet the accuracy levels set forth in Section 20.18 of the Commission's rules, *i.e.*, accuracy within 300 meters 95% of the time on a system-wide basis.

- Commnet obtained ALI-capable handsets from Airbiquity prior to the October 1, 2002 deadline, such that they were available if requested. Commnet did not encounter any problems in obtaining or negotiating agreements to obtain these ALI-capable handsets. Commnet added no new subscribers after October 1, 2002. As previously discussed, following the rule change to allow licensees to operate entirely as a "carriers' carrier", Commnet went to that business model. Commnet currently has no subscribers, but, rather, serves only the customers of other carriers. Commnet will not have any future subscribers.
- Commnet does not anticipate that full Phase II service will be available in its network until its TDMA infrastructure exhausts its useful life, which will be sometime after December 31, 2005. This is due to the reasons discussed above pertaining to the issues with the absence of any available Phase II TDMA handsets and the impossibility of employing a network-based solution, both of which are beyond Commnet's control. Commnet will be filing a request with the Commission for a permanent waiver of the Phase II requirements in the near future.
- With regard to meeting the ultimate implementation date of December 31, 2005, see above.